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December 11, 2024

Via ECF

The Honorable Leda Dunn Wettre, U.S.M.J.
United States District Court,
District of New Jersey
50 Walnut Street, Newark, NJ 07102

Re: *Days Inns Worldwide, Inc. v. Briggs Highway Advisors IA, LLC and Jonathan Malinas.*; Case No. 2:23-cv-20365-MCA-LDW

Dear Judge Wettre:

We represent Briggs Highway Advisors IA, LLC and Jonathan Malinas (collectively “Defendants”) in the above-referenced matter. Pursuant to Your Honor’s Amended Scheduling Order, we respectfully submit this status letter ahead of the status conference scheduled for December 18th.

As Plaintiff notes, the meditation before the Honorable Judge Dickson (ret) was not successful. However, omitted from Plaintiff’s status letter is that yesterday was the first time that Plaintiff’s counsel inquired about Mr. Malinas’ availability for a deposition on December 30th or 31st, we informed Plaintiff’s counsel that Mr. Malinas is not available on those dates.

Additionally, Defendants have noticed the depositions of Madhu Jonnada, John Henderson, Douglas Emann, and Kendra Mallet for the week of December 23rd, which we anticipate will also have to be rescheduled to mutually convenient dates. Therefore, Defendants agree with Plaintiff that an extension of the discovery period is necessary to allow depositions to take place.

Respectfully submitted,

Eliezer Lekht
Eliezer Lekht (330192021)

cc: All Counsel of Record via ECF